

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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SAKUNTHALA THALAHITIYA
VITHANALAGE

Plaintiff, Civ. Action No.: 3:22-cv-06248 (KMW/SAK)
v.

ALIA AL HUNAITY
and IMAD QATARNEH

Defendants.

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[PROPOSED] ORDER

THIS MATTER, having come before the Court upon the Motion of Plaintiff Sakunthala Thalahitiya Vithanalage to Compel the Production of Testimony and Documents, and with the consent of Defendant Imad Qatarneh; and the Court having considered the submissions of the parties, and oral argument, if any, and for good cause having been shown;

IT IS ON THIS _____ day of _____, 2024;

ORDERED that the U.S. Department of Homeland Security (“DHS”) and U.S. Immigration and Customs Enforcement (“ICE”) shall allow DHS Special Agent Bradley Benwell and DHS Special Agent Ronald Conyers to provide deposition testimony regarding:

1. Defendant Al Hunainty’s arrest;
2. Defendant Al Hunainty’s dwelling;
3. Ms. Vithanalage’s living conditions from approximately 2009 to 2018;
4. Ms. Vithanalage’s possessions in Defendant Al Hunainty’s home;
5. The labor that Ms. Vithanalage performed at Defendant Al Hunainty’s or Defendant Qatarneh’s direction and in Defendant Al Hunainty’s or Defendant Qatarneh’s dwellings;

6. Defendant Al Hunainty's communications with, and concerning, Ms. Vithanalage;
7. Defendant Qatarneh's communications with, and concerning, Ms. Vithanalage;
8. The Special Agents' observations regarding, and interactions with, Ms. Vithanalage; and
9. Ms. Vithanalage's immigration status.

ORDERED that DHS and ICE shall produce the following documents within 14 days from the date of this Order:

1. All documents, communications, and other materials collected from Defendants Al Hunainty and Qatarneh in the course of the Government's investigation;
2. All documents, communications, and other materials concerning Defendant Al Hunainty, Defendant Qatarneh, and Ms. Vithanalage, respectively, including documents and communications concerning any interactions, observations, conversations, interviews, searches, or impressions of each individual; and
3. Copies of any documents either (a) seized from Defendant Al Hunainty, Defendant Qatarneh, Ms. Vithanalage, or any other party in connection with this matter, or (b) used at Defendant Al Hunainty's criminal trial.

SO ORDERED.

HON. SHARON A. KING, U.S.M.J.